

**Humble, Matthew M.**

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**From:** Kealey, William P.  
**Sent:** Wednesday, November 13, 2019 3:08 PM  
**To:** Jesenia Martinez; S. Amanda Marshall; mario@mjcattorneys.com; mryan@cotsiriloslalaw.com; Emily Vermynlen; John Kristensen  
**Cc:** Humble, Matthew M.  
**Subject:** RE: Doe v Duerfahrd et al. - supplemental discovery response

I count more than 50 witness names in the three sides' pleadings, initial disclosures and discovery responses, plus the underlying investigation report, who could be deponents in this case. To date, one has been deposed. Our case management plan does not provide for 50 depositions. I think I need to see a list of probable testifying witnesses (summary judgment affiants and trial witnesses) from plaintiff and then we need to have a discussion about lifting the deposition number-caps and extending the discovery calendar to fit the length of that list.

Bill

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**From:** Jesenia Martinez <jesenia@kristensenlaw.com>  
**Sent:** Tuesday, November 12, 2019 5:33 PM  
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**Cc:** Humble, Matthew M. <MMH@stuartlaw.com>  
**Subject:** RE: Doe v Duerfahrd et al. - supplemental discovery response

Counsel:

Given the ongoing need for discovery, including depositions, and the supplemental productions needed now that the Protective Order is in place, we agree with Purdue's counsel's prior suggestion to stipulate to a continuance of deadlines in this matter and suggest that we stipulate to a 4-month continuance given the nature of this matter.

Let us know whether you all agree, and if so, we can prepare and circulate a stipulation for your review.

Thanks,

Jesenia A. Martinez



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